



August 16, 2011

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Communication, MB Docket No. 11-43

Dear Ms. Dortch:

On August 15, 2011, the undersigned of the National Association of Broadcasters (NAB) met with Erin McGrath, Acting Legal Advisor, Media, in the Office of Commissioner McDowell.

The purpose of the meeting was to discuss the rules governing the implementation of Video Description, MB Docket No. 11-43. We reiterated our position that, due to the realities of the broadcast network program production process, video description programming requirements should not become effective until October 1, 2012.¹ We also discussed the issues surrounding the technical capability of pass-through requirements for stations outside the Top 25 markets, the 2000 Order, and Congressional timetables as contemplated by the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). *Id.* at p. 14.

We discussed specific technical recommendations of the ATSC DTV standard A/53, Part 5 and mobile DTV service. *Id.* at pp. 7-8, and 22-23, respectively. Finally, we urged the Commission to harmonize video description pass-through requirements for mobile DTV transmissions with mobile DTV device capabilities as articulated in the CVAA.²

¹ See Comments of the National Association of Broadcasters, In the Matter of Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket No. 11-43, April 28, 2011 at pp. 15-17.

² See NAB Comments at p. 22, citing CVAA § 204(d) ("Deferral of Compliance with ATSC Mobile DTV Standard A/153. --- A digital apparatus designed and manufactured to receive or play back the Advanced Television Systems Committee's Mobile DTV Standards A/153 shall not be required to meet the requirements of regulations prescribed [to implement video

1771 N Street NW
Washington DC 20036 2800
Phone 202 429 5300

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Please direct any questions regarding these matters to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ann West Bobeck". The signature is stylized, with a large, looped initial "A" and a cursive-style name.

Ann West Bobeck
Senior VP and Deputy General Counsel
Legal and Regulatory Affairs

cc: Erin McGrath

description capabilities] for a period of not less than 24 months after the date on which the final regulations are published in the Federal Register.”).